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Amdt. Dated: 11/15/2004
Off. Act. Dated: 09/13/2004

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested in view of the foregoing amendments and discussion presented herein

In view of the Examiner's arguments in support of the final rejection, the Applicant believes that all outstanding issues can be readily resolved with minor claim amendments.

In order to simplify consideration of the amendments herein, the same general amendatory language has been used (albeit altered to fit the structure of the target claim) in all of the independent claims (1, 11, 16, 18, 19). In addition, it should be noted that these changes do not precipitate the need for additional searching, as they address issues already being argued with regard to supporting the rejection.

Although the Applicant believes that the claims in this most recent Office Action were interpreted in a manner inconsistent with the natural meaning and the inventive teachings of the invention, the independent claims have been slightly modified to more clearly bring out the distinctiveness of the present invention. Applicant reserves the right to pursue the original claims, or similar claims, in future continuation applications.

In the remarks put forth for each claim, the shortcomings of the rejection are first discussed in view of the Claim amendments, and then the remaining problems with the rejection are addressed.

1. **Rejection of Claims 1-8, 11-13 and 16-18 under 35 U.S.C. § 102(b).**

Claims 1-8, 11-13 and 16-18 were rejected under 35 U.S.C. § 102(b) as being anticipated by Northington et al. (U.S. No. 6,128,602).

Independent Claims 1, 11, 16, 18 and 19 have been amended within this response to speed prosecution of the Application. The elements of these amended claims clarify the distinctiveness of the present invention over the Northington '602 reference.

Discussion of how the amendments further distinguish over the references is set forth below with reference to each of the claims. The following introduction summarizes

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a number of the overall grounds for traversing the rejection.

(a) Introduction.

The teachings of Northington '602 do not equate to Applicant's teachings, as recited by Applicant's claims. This fact is immediately apparent when comparing the invention titles, in which Northington '602 is entitled *"Open-Architecture System for Real-Time Consolidation of Information From Multiple Financial Systems"*, while the Applicant's invention is entitled *"Apparatus and Method for Populating a Portable Smart Device"*.

These differences are acute when considering unamended Claims 18 and 19 which clearly distinguish a number of elements over Northington '602.

The current amendments to the independent claims then provide additional distinctions which clearly distinguish over the Northington reference. The amendments describe in greater detail aspects of the TIPCH and the data terminal device and the interaction of these devices, such as in populating the terminal (transaction device) with account information which allows the terminal to execute transactions on behalf of the user. None of these claimed aspects can be said of the Northington reference.

It should be appreciated that the teachings of Northington et al. '602 are directed at providing an intermediary layer of software within a corporate environment so that access to a variety of financial systems may be gained through a single accounting system (see abstract). In the terminology of today, Northington could be best described as "financial dashboard" software, allowing consolidation of information for retrieval by a user. The background in column 1, lines 21 - 30 of Northington et al. describes this as follows:

"For a large-scale financial entity (such as a corporation, business conglomerate, government, or other large organization), effective and accurate monitoring and control of the financial activities of its divisions, departments, and employees may require a substantial investment of resources. Generally, different types of financial transactions of the entity are performed, controlled and monitored by different, independent

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computerized financial systems. Each independent financial system may operate on a different, possibly incompatible computer platform."

In contrast, the instant application provides a mechanism for automatically populating a transaction device, such as a smart card, or other data terminal. Referring to page 7, lines 27-31 of the Applicant's specification, the Applicant explains:

"The selected device of the user preferably connects through a security gate 14 and user communications mechanism 16 to an agent based, "zero click" system that preferably includes TIPCH 18. Information gathered from inside vendors 20 and optional outside vendors 24 is automatically distributed to the user device 12 from TIPCH 18 when the user enters the system."

In view of these different objects for the inventions it is not surprising that Northington et al. '602 does not teach automatically populating a data terminal when it connects up to the transaction and information clearing house (TIPCH). It is also brought out that the data terminal spoken of by the Applicant can be selectively connected to the TIPCH functionality and need not be connected at all times. The Applicant's invention is also described in terms of a number of different embodiments of the data terminal, as can be seen from the following passage at page 4, line 24 through page 5, line 3 of the specification:

"For example, devices such as smart cellular phones, home personal computers, web-enabled kiosks and personal digital assistants (PDAs) and other financially enabled e-Commerce devices can receive information automatically when linked to the system. The user will have access to relevant information regardless of the type of access including Internet-based, wireless, cable or traditional retail point of sale environment access or of the location of access whether it is at home, business, in-store or mobile. Each device will be automatically populated with the relevant information from TIPCH and therefore the user can know the latest account status and conduct transactions from any one of the many devices at virtually any location. Furthermore, if a device is lost, stolen or destroyed the replacement device can be

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readily populated with essential information without requiring the user to manually enter all of the information into the device."

(b) Specific Traversal of Rejection.

The above aspects of the present invention are brought out in the Applicant's pending claims, which are neither anticipated nor rendered obvious by the Northington et al. '602 reference. In the remarks that follow, the Applicant will point out specific reasons for traversal of the rejection on a claim-by-claim basis.

Claim 1. This is an independent claim drawn to the system having a connection between a data terminal and a transaction infrastructure TIPCH.

The amended portions of the claim recite the data terminal as being "configured as a financially-enabled e-commerce device" and later, "wherein said data terminal is populated by said TIPCH with sufficient account information to impart transaction functionality to said data terminal on behalf of a user." These limitations bring out with clarity the distinction over the Northington reference, and nothing within Northington can be properly equated to these claim elements.

NOT ALL CLAIM LIMITATIONS ARE TAUGHT

As mentioned previously with regard to Claim 1, the Northington et al. reference describes corporate accounting software which ties together separate "independent computerized financial systems", as described in Northington '602 in column 1, lines 21-30. It does not describe functionality either within the transactions infrastructure OR within the transaction device (i.e. smart card). Northington receives only transaction data from the transactions infrastructure as evident in FIG. 6 of Northington. Furthermore, Northington describes a generally conventional Smart Card.

The data terminal (i.e. Smart Card) described in Claim 1, is "configured as a financially-enabled e-commerce device". The "terminals" described in the Northington reference are merely terminals connected to the corporate computer which ties together the data from the disparate departments. This can be seen in FIG. 6 of Northington, where "terminal 110" is connected to "system 100". The connection of card reader 660

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has nothing to do with executing transactions under Northington, but only provides an access security feature (see Column 11, Lines 60-64). Consequently, terminal 110 of Northington is not financially-enabled for executing electronic commerce transactions.

Furthermore Claim 1 also describes this financially-enabled e-commerce device as being "populated by said TIPCH" with account information. There is no description of any information retention within terminal 110 of Northington. All financial data described by Northington is retained in "database 102", there is no teachings whatsoever of populating transactions devices with account information.

Still further, the account information provides the access and security necessary to allow the data terminal to be used for executing transactions, because "sufficient account information to impart transaction functionality to said data terminal on behalf of a user" is provided. The Northington '602 system does not allow populating the Smart Card with the necessary account information, such as on a blank smart card, so that transactions could be performed with the Smart Card over the transaction infrastructure on behalf of the user. Terminal 110 of Northington clearly does not comport to the teachings of Amended Claim 1.

Therefore, Claim 1 describes elements which are not taught by Northington '602 and is not anticipated by that reference.

A number of additional problems exist with supporting the anticipation rejection of Claim 1. For example, Northington does not describe *"wherein said electronic information is automatically transferred to said data terminal when said data terminal is connected to said TIPCH"*.

The Examiner relied upon column 7, lines 45-67; abstract; and column 8, line 55 to column 9, line 24 of Northington et al. in support of the rejection. However, those portions of the cited reference do not disclose aspects which can be equated with the foregoing element of Applicant's Claim 1. In column 7, lines 45-67 report generation in Northington et al. is described, wherein data is collected for these reports in response to commands. The abstract describes how the user can *"monitor financial transactions*

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on-line and manipulate and control all financial transactions of the entity in real time using, for example, Web-browser software technology". In column 8, line 55 through column 9, line 24, Northington states:

"For example, if a user enters a request for information at remote terminal 110 or customer service terminal 120, the web services element 104 receives the command (as described in further detail below) and transmits it to navigator 404. Navigator 404 then contacts the database management system 301 of data repository element 102 to determine whether the information requested by the user is stored in database 302".

The text goes on to describe that if the data is not in the database it is collected from the external systems. The "automatic" aspect of Northington has to do with automatically transferring information from a transaction information processing clearing house to a financially enabled e-commerce device. None of the relied-upon sections of the Northington reference disclose the automatic transferring of information to the data terminal as claimed by the Applicant.

No other teachings can be found within Northington '602 which could be equated to the *"said electronic information being automatically transferred to said data terminal"*. For example, the system of Northington et al. discloses the automated collection of information from a variety of financial systems, such as seen in the summary: *"The present invention offers an open-architecture system for automatically consolidating information from a plurality of financial systems into a single system without the need for expensive and time-consuming backroom procedures."* In addition, amended Claim 1 contains additional specific information about the information being transferred, wherein it is account information (i.e. banking account and security information) and provides *"sufficient account information to impart transaction functionality to impart transaction functionality"* for the given user.

The teachings of Northington et al. do not teach: (1) automatically transferring account information to the transaction device; or (2) populating of the transaction device with sufficient account information to enable transaction functionality. These elements

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are not found in the Northington reference as would be required for supporting the rejection. Since an anticipation rejection requires that every claim element be taught or inherent in a single prior art reference (MPEP §706.02a), Claim 1 is not anticipated by the cited reference.

Therefore the rejection of Claim 1, and the claims which depend therefrom should be withdrawn.

Claim 11. This is an independent claim drawn to an electronic commerce system. In support of the rejection the elements of Claim 11 are recited as being found within the relied upon Northington et al. reference. However, Northington does not teach all of the elements recited in Applicant's Claim 11.

Portions of Claim 11 were amended in the same manner as independent Claim 1. The amended portions of Claim 11 recite the data terminal as being configured "as a financially-enabled e-commerce device" and later, "wherein said data terminal is populated by said TIPCH with sufficient account information to impart transaction functionality to said data terminal on behalf of a user." These limitations bring out with clarity the distinction over the Northington reference, further enhancing the discussion of the transaction execution by the TIPCH unit which transfers funds in response to authorization from the data terminal. As described with respect to Claim 1, these aspects of Applicant's claimed invention are not described nor are they inherent in the Northington reference. There is nothing within the Northington reference that can be properly equated to these claim elements.

A number of additional problems exist with the rejection of Applicant's Claim 11. For example, one portion of Claim 11 recites: *"said information automatically transferred to said data terminal when said data terminal is connected to said TIPCH"* and *"wherein said TIPCH is configured to interface with a financial processing system to transfer funds from a user's account to a vendors account when authorized by [[a]] said data terminal"*. This aspect is similar to that contained in Claim 1, and the same sections of Northington et al. are provided in support of the rejection. However, similar to Claim 1,

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no portion of the relied-upon Northington et al. reference teaches anything to comport with this aspect of the invention. The Northington et al. system does not automatically transfer information to the data terminal upon connection with the TIPCH, while furthermore the data being transferred cannot be compared to populating the device with account information which imparts transaction functionality to the transaction device on behalf of the user.

Therefore the rejection of Claim 11, and the claims which depend therefrom should be withdrawn.

Claim 16. This is an independent claim drawn to a method for permitting an electronic commerce transaction. In support of the rejection, the Examiner stated that the elements of amended Claim 16 were taught by Northington et al. However, Northington does not teach all of the elements recited in Applicant's amended Claim 16.

The amended portions of Claim 16 recite the same elements added to independent Claim 1 and 11 in further clarifying the distinctions of the invention. In addition, Claim 16 was otherwise amended to break up the steps recited for the TIPCH on separate lines.

Specifically, the additions include describing the data terminal as being a "financially-enabled e-commerce" device. An additional step was added reciting "populating said data-transaction device by said TIPCH with sufficient account information to impart transaction functionality to said data terminal on behalf of a user;". These elements are generally equivalent to those added to previous independent Claims 1 and 11.

As brought out with regard to Claims 1 and 11, these limitations clarify the distinction over the Northington reference, and are not described nor inherent in the relied upon reference.

There are additional problems with the rejection of Claim 16. For example, one portion of Claim 16 recites: "...said TIPCH automatically providing said electronic content to said data-transaction device". The sections of Northington et al. relied upon

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by the Examiner (figure 6; column 3, line 62 to column 4, line 6; column 10, line 66 to column 11, line 3; and column 6, line 52 to column 7, line 3) do not comport to this portion of the claim. There is nothing in those teachings which describes *"TIPCH automatically providing said electronic content to said data-transaction device"*, as this is known in Applicant's invention. In the embodiment of Figure 6 of Northington et al. the system contains a Smart Card 650 shown for use at the POS. However, the Smart Card is utilized conventionally by Northington. Referring to column 11, lines 56 - 64, Northington et al. states: *"According to another preferred embodiment depicted in FIG. 6, transactions at the merchant point-of-sale terminal 610 may be performed using smart card technology as may be known to one of skill in the art. In a preferred embodiment depicted in FIG. 6, smart card access to the network is represented by smart card element 650 connected to merchant point-of-sale terminal 610. According to another embodiment of the present invention, smart cards may be used to access the system 100. A remote terminal 110 with an optional attached smart card reader (shown as 660 in FIG. 6) may use the data stored on smart cards to authorize usage of the system"*. There is no discussion of utilizing the Smart Card as a data transaction device (i.e., *"said TIPCH automatically providing said electronic content to said data-transaction device"*) as recited in Applicant's Claim 16.

Furthermore, there is no discussion of the *"transaction device having a unique identifier corresponding to the user"* as recited in Claim 16. The teachings of Northington et al. are based on terminals coupled to a network which rely on user passwords and such for controlling access. For example, see column 6, lines 52-60: *"As depicted in FIG. 2, a preferred embodiment of a gateway and network services element 101 includes a login manager 201 for controlling login and handshaking functions between system 100 and all external interfaces, including financial systems 106 and 112. The login manager 201 also performs security functions to prevent unauthorized internal and external access to system 100, for example, using encryption, password and/or other security techniques known to one of skill in the art."*

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In addition, Northington et al. describes at column 3, line 62 through column 4, line 2: *"A web services element that provides user access to the information stored and obtained by the system via one or more remote terminals, for example using browser software technology. The web services element also enables transmission of data requests, management and control commands, report requests, and data between the system and the remote terminal in accordance with the user's level of security clearance or access level."*

In the teachings of Northington et al. the data is only provided to terminals in response to commands for data. There is no discussion in Northington et al. of *"providing electronic content for storage in said data-transaction device"* as would be required in support of the rejection. The automated portion of Northington operates such that if the data is not found in the database then it is automatically collected from a selected financial system or systems.

Consequently, elements of amended Claim 16 are not found within the relied upon reference, and Claim 16 is thus not anticipated by the reference. Therefore, the rejection of Claim 16 and the claims which depend therefrom should be withdrawn.

Claim 18. This is an independent claim drawn to a transaction and information processing clearing house (TIPCH) for use within an electronic transaction system. In support of the rejection, the Examiner stated that the elements of Claim 18 are found in Northington et al. However, Northington does not teach all of the elements recited in Applicant's Claim 18.

Portions of Claim 18 were amended in the same manner as independent Claim 1 and 11. The amended portions of Claim 18 recite the *"transaction device identifiers"* as being *"within a plurality of financially-enabled e-commerce devices."* In addition the authorization logic coupled to the secure database is described *"to populate a financially-enabled e-commerce device with sufficient account information to impart transaction execution functionality therein on behalf of a user."* Furthermore, the account information retrieved from selected consumer accounts are described as being

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"of at least one vendor or financial institution".

These limitations bring out with clarity the distinction over the Northington reference. Additionally, the wording clarifies other aspects of the system, such as that the device identifiers are retained within transaction devices, and that the TIPCH operates within an electronic transaction system. It is clear that the Northington reference, as mentioned previously with regard to Claims 1 and 11, does not disclose any means "to populate an e-commerce device with sufficient account information to impart transaction execution functionality therein on behalf of a user."

A number of additional problems exist with supporting the anticipation rejection of Claim 18. For example, one portion of Claim 18 recites: *"a secure database identifying accounts corresponding to a particular device identifier"*. Northington et al. teaches the use of a terminal executing a browser which can display data from the database in response to commands. Security is provided by way of user passwords, there is no discussion of *"identifying accounts corresponding to a particular device identifier"*.

Therefore, Applicant respectfully asserts that Claim 18 is not anticipated by Northington et al. and requests that the rejection be withdrawn.

Claims 2-8, 12-13, 16-17. These are the dependent claims within this group of claims subject to an anticipation rejection.

These dependent claims should be considered *a fortiori* allowable, because being dependent from base claims shown to be allowable, they too should be considered allowable.

However, many of these dependent claims have their own separate basis for avoiding an anticipation rejection, the following is given by way of example.

In Claims 5 and 11, a *"security mechanism"* is recited wherein *"access to said terminal is restricted to a particular user"*. This does not comport to the security of a browser or firewall running on a terminal as taught by Northington et al. in column 3, line 62 through column 4, line 6; or in column 10, line 66 through column 11, line 3.

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Terminals by their nature are not restricted to a particular user, and the system of Northington describes the use of password based or smart card based security. The terminal of Northington, which is not a transaction device, accepts a smart card for selecting who can use the terminal to access the system. In neither case is the use of the terminal restricted to one user. It should be realized that the "terminal" being spoken of Applicants claims can be exemplified as a Smart Card, while the "terminal" referred to by Northington is a computer access type terminal which can not be equated to a Smart Card as it does not provide transaction capability, nor it is configured to provide access and transaction capability to a single user.

Therefore, Claims 1-8, 11-13 and 16-18 are not anticipated by Northington et al. and the rejection should be withdrawn.

2. Rejection of Claims 9-10, 14-15 and 19-27 under 35 U.S.C. § 103(a).

Claims 9-10, 14-15 and 19-27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Northington et al. (U.S. No. 6,128,602).

Claims 9-10 and 14-15. These claims depend from independent claims rejected on the basis of anticipation (35 U.S.C. § 102(b)) by the cited reference. It has been shown, however, that the amended independent claims are clearly not anticipated by the Northington reference, wherein these dependent claims should be considered a *fortiori* allowable.

Claim 19. This is an independent claim within this group of claims (Claims 19-27). The teaching of the Northington reference does not equate to the teachings described by Claim 19.

Northington describes neither the TIPCH aspects, NOR the transaction device aspects which are described in Applicant's Claim 19.

Northington DOES NOT contain a Transaction and Information Clearing House (TIPCH) as described by Applicant's Claim 19. Northington clearly describes a software application for integrating information resources within a corporate computer environment, and it connects to a conventional transaction network. This is most

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clearly apparent from FIG. 6 showing *"merchant transaction network 601"* coupled to *"system 100"*. System 100 is not a clearing house for account information. It can connect to a check clearing house 641, but does not provide the information clearing house functionality described in the claim. Specifically, Northington does not provide a clearing house for *"electronic account information"* as would be required to equate it to this aspect of Claim 19. Northington can collect transaction information from the merchant acquirer 613 only, as shown in FIG. 6. It is clearly unable to collect information which provides *"sufficient account information to impart transaction functionality"* which is explicitly recited in Applicant's amended Claim 19.

The identifier described within the transaction device ties in with this clearing house functionality to facilitate executing transactions, wherein the execution of transactions is described *"between an associated user account accessible to said TIPCH and one or more vendor accounts"*. The TIPCH is configured to automatically populate the memory of a portable transaction device. These aspects are nowhere taught within Northington '602.

Furthermore, there is no teaching, suggestion, or motivation within the Northington reference which would lead one of ordinary skill in the art toward modifying Northington to perform in a manner similar to Applicant's invention as taught by Claim 19. Also there exists additional problems with the reference as it is directed toward different goals and operating principles. As mentioned previously, Northington '602 describes a system for collecting information across an enterprise, and it is not directed toward populating a transactions device, such as smart card, with account information which allows it to execute a transaction, or to collect other forms of account information from vendors routed through the TIPCH.

The above problems are clearly evident in the wording of amended Claim 19 and the lack of support for a rejection provided by the teachings of Northington et al.; these are intractable problems with the rejection. It should also be readily recognized that a rejection of amended Claim 19 based on the Northington '602 reference suffers from a

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number of fatal problems, including: all claim limitations are not taught, new principle of operation utilized, solved a different problem, lack of specificity of suggestion to modify, elements in references are not equivalent, modified reference does not add up to the invention, and no need of elements within the reference. Consequently, no *prima facie* case of obviousness has been established.

Claims 20-27. These claims depend from Claim 19, whose non-obviousness over the relied-upon reference has been demonstrated. Consequently, dependent Claims 20-27 should be considered a *fortiori* allowable.

Therefore, amended Claim 19 is not obvious in view of the Northington et al. reference and the rejection of Claim 19 and the claims that depend therefrom should be withdrawn.

3. Amendment of Claims 1, 2, 3, 6-7, 11, 16, and 18-19.

Claims 1, 11, 16, 18 and 19. These independent claims were all similarly amended to clarify that the "data terminal" is configured for executing e-commerce transactions and is configured for being populated from the TIPCH with "sufficient account information to impart transaction functionality".

Claim 16 also clarifies the electronic content as being received from "at least one vendor or financial institution" and that the association between user and data-transaction device is maintained "within said TIPCH". The term "conducting" has been replaced with "executing" which is more in line with the industry, and nested steps have been separated to improve readability.

Claim 18 also clarifies that the device identifiers are "within a plurality of financially-enabled e-commerce devices", and similarly clarifies that account information is retrieved from "selected consumer accounts of at least one vendor or financial institution".

These changes are supported partially by other claims, specifically Claims 19 and 27, and at a number of places in the specification, including the following.

Page 4, Lines 23-28:

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"The user will preferably have access to financial and account status information regardless of the type device used to access the system. For example, devices such as smart cellular phones, home personal computers, web-enabled kiosks and personal digital assistants (PDAs) and other financially enabled e-Commerce devices can receive information automatically when linked to the system."

Page 7, Lines 32-33:

"Data-transaction device 12 preferably has a transaction functionality as well as a data receipt and storage capability."

Page 4, Line 32 through Page 5, Line :

"Each device will be automatically populated with the relevant information from TIPCH and therefore the user can know the latest account status and conduct transactions from any one of the many devices at virtually any location. Furthermore, if a device is lost, stolen or destroyed the replacement device can be readily populated with essential information without requiring the user to manually enter all of the information into the device."

Page 7, Lines 1-6:

"The system and method of the present invention enables a user to maintain credit, bank account and other consumer information in a single repository and to receive updated account and other information automatically as well as conduct electronic commerce transactions with any number of computation devices from any location. With this system, lost, stolen or damaged devices as well as new devices can be automatically populated with information at any time."

Claim 2. This is a dependent claim which was amended to properly clarify the nature of the electronic signals being sent from the data terminal transaction device to the TIPCH. Support is found throughout the specification including, Page 11, Lines 12-13:

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"The information is preferably encrypted and delivered to TIPCH 18 over a secure connection at the time of registration."

Claims 3 and 7. Claims 3 and 7 are dependent claims which were amended to remove unnecessary verbiage, wherein *"said system further comprising"* was changed to simply *"further comprising"*. This is more in line with the structure of the remaining claims.

Claim 6. This dependent claim was amended to clarify which information was being protected by the security measures as there was some confusion properly interpreting this claim. Specifically, *"wherein said transaction and information processing clearing house further comprises a security mechanism, wherein access to the information stored for a particular user within said financial and information processing clearing house is restricted to [[a]] said particular user"*.

This aspect of the invention is also described in Claims 7, 12, 13 as well as in the specification, such as including the following.

Page 3, Lines 13-17:

"The preferred embodiment of the invention includes a personal computing device, such as a digital wallet, that has a unique identifier (ID) and is capable of connecting with a transaction and information processing clearing house (TIPCH) by a secure link. The computing device preferably incorporates a security device such as on-card fingerprint recognition technology."

Page 13, Lines 10-13:

"Security gate 14 authorizes entry to the users database and a secure link is established with the data-transaction device through user communications mechanism 16."

Page 16, Lines 2 - 7:

"Security gate 14 or alternatively TIPCH 18, verifies the registration of data-transaction device 12 at block 204. If the device has not been registered to a new or existing registered user, the user of data-transaction device 12 is prompted to provide

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device registration information at block 206. Data-transaction device 12 preferably has a unique identifier that associates the specific device with the account at TIPCH 18."

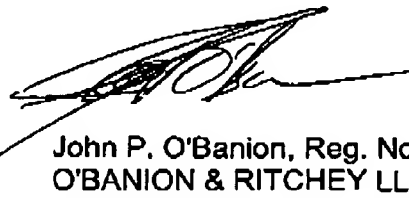
4. Conclusion.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

The Applicant also respectfully requests a telephone interview with the Examiner in the event that there are questions regarding this response, or if the next action on the merits is not an allowance of all pending claims.

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Respectfully submitted,



John P. O'Banion, Reg. No. 33,201
O'BANION & RITCHEY LLP
400 Capitol Mall, Suite 1550
Sacramento, CA 95814
(916) 498-1010